



PATENT
DOCKET NO.: 2207/5939

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANTS : VORA, SANJAY et al.
SERIAL NO. : 09/222,554
FILED : December 29, 1998
FOR : STRUCTURED WEB ADVERTISING
GROUP ART UNIT : 2176
EXAMINER : Huynh, Cong Lac T

Mail Stop Appeal Brief - Patents
HON. COMMISSIONER
FOR PATENTS
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF UNDER 37 CFR 41.37

SIR:

This brief is in furtherance of the Notice of Appeal, filed in this case on July 5, 2005.

1. REAL PARTY IN INTEREST

Intel Corporation is the real party in interest for all issues related to this application.

2. RELATED APPEALS AND INTERFERENCES

There are no other appeals, interferences, or judicial proceedings known to Appellant or Appellant's legal representative, which may be related to, directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

3. STATUS OF THE CLAIMS

This application currently contains claims 1-9, and 13-25. Claims 1-9, 16, and 20-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Markowitz et al., U.S. Patent No. 6,311,185 B1 (hereinafter "Markowitz") in view of Yu, U.S. Patent No. 6,067,552 (hereinafter "Yu"). Claims 13-15 and 17-19 were also rejected under 35 U.S.C. § 103(a) as being unpatentable over Markowitz in view of Yu. Claims 1-9 and 13-25 stand finally rejected and are the subject of this appeal.

4. STATUS OF AMENDMENTS

No amendments to the claims were made in the Response to the Final Office Action. The attached claims reflect the current status of the claims.

5. SUMMARY OF THE CLAIMED SUBJECT MATTER

Information from different sources is frequently linked, through physical means (e.g. cut-and-paste) or using computers or similar means. Through this linking, two formerly unassociated units of information become associated, so that a user accessing one unit of information will be presented with both. For example, a user accessing a Web page will also access any electronic advertisements displayed on that page.

Often, one of these units of information will be predetermined (or "given"). Another unit of information will then be selected (or "chosen") to be linked to the given unit of information. The chosen information unit will often be selected from among a group of information units eligible for linking to the given information unit. This group of information units is referred to as "candidate information" because it includes units of information which are candidates to be selected for linking to the given piece of information. For example, a group of electronic advertisements would constitute candidate information if it was available for linking to a Web site (given information). The candidate information group may contain many units of candidate information, and there may be continual adding and deleting of units from the group.

The content (including characteristics) of the given information unit usually will determine which candidate information unit will be linked to the given information unit. The content of the given information is compared with the content (including characteristics) of the candidate information, and the best match is selected.

The field of advertising commonly presents occasions for linking of information. Advertisers seek to target their ads to consumers likely to consume their products. Linking the ads to information that these consumers desire enables the advertisers to target these consumers. For example, magazine publishers producing an issue focusing on a particular topic may attempt to attract advertisements from advertisers related to that topic, and may place the ads in the magazine near the relevant stories.

Publication of information on the World Wide Web is largely advertiser-funded. Operators of Web sites provide information on various pages of those sites which users access over the Internet. Web site operators place advertisements on their sites in exchange for payments from

advertisers. These advertisements may include electronic displays of text and/or pictures, and may include links to Web sites operated by the advertiser.

Placing an advertisement on a Web page is an example of selecting a candidate information unit (advertisement) for a given information unit (Web page), and linking the two together. By matching the content of the given information unit to the candidate information units, the advertiser is able to target the users accessing the given information.

In the above-mentioned example, the given information is manually examined and compared to the candidate information in order to select one of the candidates to link to the given information. This laborious and time-intensive process is a limit on the linking of information. Furthermore, the candidate information group is usually not organized specifically for the purpose of selecting and linking the candidate information. Only the most general linkings are practical, such as, for example, linking ads to magazines with a focused audience, or a special issue devoted to a certain topic.

Web sites generally contain advertisements related to their general, but not specific content. Web sites including multiple Web pages may be divided into sections for certain topics. Advertisements related to those topics are allocated to the related sections, but it is not presently practical to allocate ads based on page-by-page content.

In addition to manual examination of given information, manual processing of the information, and linking to selected candidate information, as described above, other techniques have been used by Web advertisers to target their advertisements to certain users. Web search engine operators employ user-input data to present certain ads to users. When a user inputs search terms to retrieve links to Internet sites, the search engine compares the user-input information to Web site descriptors contained on the site (meta-text) to retrieve addresses of sites containing

matches to the search terms. The search engine substantially simultaneously searches a database of advertisements for matches to the input search terms. The search engine then displays links to the retrieved Web sites along with selected advertisements.

Another method by which computer software can provide information to a user, based on user inputs, is a feature of some user-oriented software programs (*e.g.* word-processing programs). This feature continually compares user keystrokes and command selections to a database containing lists of inefficient keystrokes and command selections and corresponding user messages. When a match is found, the software will display a message to the user suggesting a more efficient way to perform the user's desired task. In this way, even though the user is not aware of which of the user inputs will trigger a message, valuable information will be sent to the user automatically.

Independent claim 1 recites a method for associating a chosen information unit with a given information unit. In a first operation, the method automatically determines a content data of the given information unit by searching the given information unit (see *e.g.*, pg. 7, lines 3-14 and element 1 of Fig. 2), indexing the given information unit to produce indexed data (Id.), and performing a relevancy ranking on the indexed data (see, *e.g.*, pg. 7, line 15 to pg. 8, line 9 and element 2 of Fig. 2). In the second operation, the method automatically selects the chosen information unit as a function of the relevancy ranking on the indexed data (see, *e.g.*, pg. 10, line, 20 to pg. 11, line 8 and element 4 in Fig. 2).

Independent claim 2 recites a method for selecting a candidate information unit for linking to a given information unit. First, content data of the candidate information unit is determined (see, *e.g.*, pg. 8, line 17 to pg. 9, line 6 and element 21 in Fig. 3). Then, a content data of the given information unit is automatically determined by searching the given information unit (see *e.g.*, pg.

7, lines 3-14 and element 1 of Fig. 2), indexing the given information unit to produce indexed data (Id.), and performing a relevancy ranking on the indexed data (see, e.g., pg. 7, line 15 to pg. 8, line 9 and element 2 of Fig. 2). Next, the ranked index data of the given information unit is compared to the content data of the candidate information unit (see, e.g., pg. 8, lines 10-16 and element 3 in Fig. 2). Then, the candidate information unit for linking to the given information unit is elected as a function of said comparing the ranked index data of the given information unit to the content data of the candidate information unit (see, e.g., pg. 10, line, 20 to pg. 11, line 8 and element 4 in Fig. 2).

Independent claim 3 recites a method for selecting a candidate information unit for linking to a given information unit. First, a content data of the candidate information unit is determined (see, e.g., pg. 8, line 17 to pg. 9, line 6 and element 21 in Fig. 3). Then, a content data of the given information unit is automatically determined by searching the given information unit (see e.g., pg. 7, lines 3-14 and element 1 of Fig. 2), indexing the given information unit to produce indexed data (Id.), and performing a relevancy ranking on the indexed data (see, e.g., pg. 7, line 15 to pg. 8, line 9 and element 2 of Fig. 2). Next, the ranked indexed data of the given information unit is automatically compared to the content data of the candidate information unit (see, e.g., pg. 8, lines 10-16 and element 3 in Fig. 2). Then, the candidate information unit for linking to the given information unit is selected as a function of automatically comparing the ranked indexed data of the given information unit to the content data of the candidate information unit (see, e.g., pg. 10, line, 20 to pg. 11, line 8 and element 4 in Fig. 2).

Independent claim 16 recites a method for associating a chosen information unit with a given information unit. First, a user computer system data is automatically determined by running a diagnostic program on the user computer system to determine at least one of a component

coupled in the user computer system and a software program loaded on the user computer system (see, e.g., pg. 20, line 20 to pg. 21, lines 4 and element 82 in Fig. 9). Then, a chosen information unit is selected as a function of the user computer system data (see, e.g., pg. 21, lines 7-10 and element 84 in Fig. 9).

Independent claim 20 recites an article comprising a storage medium including a set of instructions, the set of instructions capable of being executed by a processor to implement the method of claim 1.

Independent claim 21 recites an article comprising a storage medium including a set of instructions, the set of instructions capable of being executed by a processor to implement the method of independent claim 2.

Independent claim 22 recites an article comprising a storage medium including a set of instructions, the set of instructions capable of being executed by a processor to implement a method for selecting a candidate information unit for linking to a given information unit. First, a content data of the candidate information unit is automatically determined by searching the given information unit (see e.g., pg. 7, lines 3-14 and element 1 of Fig. 2) indexing the given information unit to produce indexed data (Id.), and performing relevancy ranking on the indexed data (see, e.g., pg. 7, line 15 to pg. 8, line 9 and element 2 of Fig. 2). Then, a user computer system data is automatically determined by running a diagnostic program on the user computer system to determine a component coupled in the user computer system or a software program loaded on the user computer system (see, e.g., pg. 20, line 20 to pg. 21, lines 4 and element 82 in Fig. 9). Next, content data of the candidate information unit is determined (see, e.g., pg. 8, line 17 to pg. 9, line 6 and element 21 in Fig. 3). Next, the content data of the candidate information unit is compared to two of the following: a ranked index data of the given information unit, a user computer system

data, and a user input data (see, e.g., pg. 21, lines 5-18 and element 83-88 of Fig. 9). Then, the candidate information unit for linking to the given information unit is selected as a function of the comparison (Id.).

Independent claim 25 recites a computer system including a server (see, e.g., pg. 6, line 17 to pg. 7, line 2 and element 30 in Fig. 1), a given information unit and a candidate information unit where the server is adapted to determine a content of the candidate information unit. The server is to automatically determine a content of the given information unit by searching the given information unit (see e.g., pg. 7, lines 3-14 and element 1 of Fig. 2), indexing the given information unit to produce indexed data (Id.), and performing a relevancy ranking on the indexed data (see, e.g., pg. 7 line 15 to pg. 8, line 9 and element 2 of Fig. 2). The server is also to automatically compare the ranked index data of the given information unit to the content data of the candidate information unit to create a comparison result, and link the candidate information unit to the given information unit as a function of the comparison result (see, e.g., pg. 10, line, 20 to pg. 11, line 8 and element 4 in Fig. 2).

6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

A. The rejection of claims 1-9, 16, and 20-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Markowitz et al., U.S. Patent No. 6,311,185 B1 (“Markowitz”) in view of Yu, U.S. Patent No. 6,067,552 (“Yu”).

B. The rejection of claims 13-15 and 17-19 were also rejected under 35 U.S.C. § 103(a) as being unpatentable over Markowitz in view of Yu.

7. **ARGUMENT**

A. **Legal Background**

Absent anticipation it may be possible to combine two or more patents together to render a claimed invention obvious, and unpatentable, under 35 U.S.C. § 103(a). In determining whether the claims are unpatentable it is necessary to look at what the references actually teach. “It is impermissible within the framework of § 103 to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In Re Wesslau, 147 U.S.P.Q. (BNA) 391, 393 (C.C.P.A. 1965). Accordingly, a prior art reference must be considered in its entirety, and portions thereof must be taken in proper context. MPEP § 2141.02; Bausch & Lomb, Inc. v. Barnes-Hind, Inc., 230 U.S.P.Q. (BNA) 416, 419 (Fed. Cir. 1986).

B. **Argument**

According to an embodiment of the present invention, content data (such as a theme) for a given information unit (such as a web page) is determined and an information unit (such as an ad) is chosen as a function of the content data (theme). These processes are done dynamically, based on one or more algorithms. In the claims the content data of the given information unit is determined by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data. The ranked index data may then be compared to the information unit. (See, for example, page 7, lines 3-14; page 7, line 15 to page 8, line 16; page 8, line 17 to page 9, line 6; and page 10, lines 9-19).

Appellants respectfully submit that Markowitz fails to teach or suggest a method for associating a chosen information unit with a given information unit comprising: automatically determining a content data of the given information unit; and automatically selecting the chosen information unit as a function of the ranked index data of the given information unit.

The Examiner has stated, in regards to claim 1 that Markowitz discloses ‘automatically determining a content data of the given information unit’ in column 1, lines 32-42 by its reference “...displaying advertisement on their Web pages... a Web page containing travel tips... could include... a hotel advertisement.” Appellants respectfully submit that Markowitz provides for no more than establishing a simple, static link directly to another Web page (e.g., a hotel advertisement) when a specific search is requested. Appellants submit that although Markowitz refers to utilizing a ‘history database’ that can be consulted by the server when selecting an advertisement (see col. 3, line 2), there is no disclosure as to what sorts of information are stored in the database. The text states that “if a user had previously requested a large number of Web pages related to sports” The user would need to maintain a list of sports-related websites (e.g., espn.com, cnnsi.com, etc.). There is no disclosure as to how a “sports-related” website is determined.

According to embodiments of the present invention, documents are classified utilizing rules of evidence by an array of parameters, including such things as information stored in the user’s cookies, the user’s computer settings, the date, etc. Further, embodiments of the present invention utilizes ‘fuzzy’ concept-based searching. (See, for example, page 7, lines 3- 14). Appellants submit that the present invention does not involve simply statically linking a Web page (such as a travel ad) to a search term, as does Markowitz. The present invention involves utilizing dynamic processes for selecting and categorizing. These processes are based on algorithms, such

as methods of indexing and relevancy ranking terms and information. (See, for example, page 7, line 15 to page 8, line 9). As a further example of the dynamic nature of the processes, Appellants submit that decision-making based on various parameters by specific algorithms, such as comparisons of determined relevancy rankings, are utilized to determine if documents' rankings fall above a certain percentage to reduce the number of performed comparisons. (See, for example, page 8, line 4-6).

Appellants respectfully contend that the Examiner is mis-interpreting the disclosure of the Markowitz reference. For example, in a previous Office Action, the Examiner points out that "Markowitz does mention selecting a related advertisement to a web page based on the attributes of the requested Web page." The Examiner seeks to give the term "attributes" a broad meaning to include content data, such as the data referred to in the claims (e.g, claim 1). Markowitz, however, does define this term in the specification. Particular attention is drawn to claims 11 and 12 of Markowitz. There, the term "attributes" is defined to relate to how to put an advertisement into an HTML page (based on the presence and location of text and graphics or the colors of the text). In other words, nowhere in Markowitz is it suggested that the term "attributes" has a meaning in line with the currently pending claims (see, also, Column 3, lines 19-37). The problem that Markowitz is dealing with is how to best place an advertisement given what a web-page looks like, not based on its informational content (e.g., what the page is about).

As to the "history database," the Examiner has stated that Markowitz "does disclose the information stored in the database is the advertisements since the database is the advertisement repository database." It still remains unclear as to how storing advertisements in a history database would lead one to determine content data of the given information unit and selecting a chosen information unit based on it.

As to the content of the web-page, the Examiner has stated that it is “easy to determine what field said web page or web site is related to.” However, all Markowitz says is that “if a user had previously requested a large number of web pages related to sports, an advertisement for a sporting goods store might be selected.” There is no disclosure as to how this is done (whether it would be “easy” or not). The supplementation of the deficiencies of the Markowitz reference is impermissibly coming from the present application. Appellants have provided legitimate ways for the Markowitz reference to work outside of the presently claimed invention. For example, if one selects “espn.com” then that web-address is linked to an advertisement that concerns “sports.” The actual content of the espn.com page is not determined in such an example (except maybe one-time by a service provider).

In the Final Office Action, from which this Appeal is taken, in paragraph 10, the Office Action points to Col. 3, lines 2-12 that state in part “if a user has previously requested a large number of Web pages related to sports, an advertisement for a sporting good store might be selected ...” and additionally adds that “[t]he fact that a sport-related advertisement is selected for a sport web page inherently shows that the advertisement selection in Markovitz is based on the content of the requested web page and the content of the advertisement.” Appellants respectfully disagree.

The cited section is the only section of the Markowitz reference that refers to this “sporting good store ad” feature. The other sections of the reference cited in the Office Action pertain to physical attributes of a web-page, which the Examiner agrees are not related to content of a web-page. In particular, the description at Col. 1, lines 32-42, refers to a manual process (not an automatic process) where the content provider selects which ads are to be placed in Web pages to be downloaded through an ISP and a user. Col. 2, lines 60-64 refer to the standard loading of a

web-page and Col. 3, line 60 to col. 4, line 19 merely states that an appropriate advertisement is selected from a repository and placed within the HTML code of the requested web page.

There is little disclosure other than at the top of Col. 3, which is cited repeatedly in the Office Action. The “history database” of this section appears to store a list of web-sites that have been visited by the user. The Office Action appears to agree, in paragraph 12 that this would be the content of the history database. Thus, if a history database includes a list of web-sites (i.e., Uniform Resource Locators) such as “www.uspto.gov” and “www.espn.com,” then the only information available is the text of the URL and not the content of a web-site pointed to by the URL text. Such text is typically generated manually by a programmer and may or may not be related to the content of the web-page to which the URL refers. Given the text of the URLs, one would ask, “how is the content of these Web pages determined in Markowitz?” Markowitz is completely silent on this point.

Thus, the Office Action appears to inappropriately supplement the disclosure of Markowitz in order to reach the claim limitations. In addition to the lack of disclosure as to how the content of a Web page is determined it is also unclear how the content of an advertisement is determined, how the content of a Web page is compared to the content of an advertisement. None of these questions are answered by the Markowitz reference. Thus, Markowitz fails to teach the features of the presently claimed invention as contended in the Final Office Action.

The Yu reference fails to make up for the deficiencies of Markowitz. There is nothing in the Markowitz or Yu reference that teaches or suggests the automatic production and ranking of indexed data for a given information unit and comparison of that the ranked index data can be compared to chosen information unit. as described in Applicants’ previous remarks.

Accordingly Appellants respectfully request reversal of the rejection of claims 1-25 under 35 U.S.C. § 103(a).

CONCLUSION

Appellant respectfully requests that the Board of Patent Appeals and Interferences reverse the Examiner's decision rejecting claims 1-5, 13-15, 28-32, and 36-41 and direct the Examiner to pass the case to issue.

The Commissioner is hereby authorized to charge the appeal brief fee of \$500.00 and any additional fees which may be necessary for consideration of this paper to Kenyon & Kenyon Deposit Account No. 11-0600. A copy of this sheet is enclosed for that purpose.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shawn O'Dowd".

Shawn W. O'Dowd (Reg. # 34,687)

Date: February 6, 2006

KENYON & KENYON
1500 K Street, NW
Suite 700
Washington, DC 20005
(202) 220-4200 telephone
(202) 220-4201 facsimile
DC1-559836

APPENDIX

(Brief of Appellant S. Vora
U.S. Patent
Application Serial No. 09/222,554)

8. CLAIMS ON APPEAL

The claims in their current form are presented below:

1. (Previously Presented) A method for associating a chosen information unit with a given information unit comprising:

automatically determining a content data of the given information unit by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data; and

automatically selecting the chosen information unit as a function of the relevancy ranking on the indexed data.

2. (Previously Presented) A method for selecting a candidate information unit for linking to a given information unit comprising:

determining a content data of the candidate information unit;

automatically determining a content data of the given information unit by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data;

comparing the ranked index data of the given information unit to the content data of the candidate information unit; and

selecting the candidate information unit for linking to the given information unit as a function of said comparing the ranked index data of the given information unit to the content data of the candidate information unit.

3. (Previously Presented) A method for selecting a candidate information unit for linking to a given information unit comprising:

determining a content data of the candidate information unit;

automatically determining a content data of the given information unit by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data;

automatically comparing the ranked indexed data of the given information unit to the content data of the candidate information unit; and

selecting the candidate information unit for linking to the given information unit as a function of said step of automatically comparing the ranked indexed data of the given information unit to the content data of the candidate information unit.

4. (Original) The method of claim 3, further comprising:

after determining the content data of the candidate information unit, placing the candidate information unit in a look-up tree according to the content data of the candidate information.

5. (Previously Presented) The method of claim 4, wherein:

automatically comparing the ranked index data of the given information unit to the

content data of the candidate information unit comprises traversing the look-up tree.

6. (Original) The method of claim 4, wherein:

the structure of the look-up tree includes the content data of the candidate information.

7. (Original) The method of claim 4, wherein:

the given information unit is available on the Internet.

8. (Original) The method of claim 3, wherein:

determining the content data of the candidate information unit includes:
collecting the content data of the candidate information unit;
incorporating the content data into the candidate information unit; and
storing the candidate information unit and the content data of the candidate information unit.

9. (Original) The method of claim 3, wherein:

determining the content data of the candidate information unit includes:
collecting the content data of the candidate information unit;
linking the content data to the candidate information unit; and
storing the candidate information unit and the content data of the candidate information unit.

10. (Canceled)

11. (Canceled)

12. (Canceled)

13. (Previously Presented) The method of claim 3, wherein:

the given information unit includes a page of content on the World Wide Web.

14. (Previously Presented) The method of claim 3, wherein:

the candidate information unit includes an advertisement to be displayed to a user.

15. (Previously Presented) The method of claim 3, wherein:

determining a content data of the given information unit further includes:
selecting a keyword;
counting a number of occurrences of the keyword; and
ranking the key word according to the number of occurrences of the keyword.

16. (Previously Presented) A method for associating a chosen information unit with a given information unit comprising:

automatically determining a user computer system data by running a

diagnostic program on the user computer system to determine at least one of a component coupled in said user computer system and a software program loaded on said user computer system; and

selecting a chosen information unit as a function of the user computer system data.

17. (Previously Presented) The method of claim 3, further comprising:

accessing a user computer system through a user Internet connection;

querying the user computer system to determine a user computer system data;

and

returning the user computer system data through the user Internet connection;

18. (Original) The method of claim 3, wherein:

the given information unit includes a user-input information.

19. (Original) The method of claim 14 further comprising:

obtaining a user-input information; and

incorporating the user-input information into the content data of the given information unit.

20. (Previously Presented) An article comprising a storage medium including a set of instructions, said set of instructions capable of being executed by a processor to implement a method for associating a chosen information unit with a given information unit, the method

comprising:

automatically determining a content data of the given information unit by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data; and

automatically selecting a chosen information unit as a function of the ranked index data of the given information unit.

21. (Previously Presented) An article comprising a storage medium including a set of instructions, said set of instructions capable of being executed by a processor to implement a method for selecting a candidate information unit for linking to a given information, the method comprising:

determining a content data of the candidate information unit;

automatically determining a content data of the given information unit by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data; and

automatically comparing the ranked index data of the given information unit to the content data of the candidate information unit;

selecting the candidate information unit for linking to the given information unit as a function of said step of automatically comparing the ranked index data of the given information unit to the content data of the candidate information unit.

22. (Previously Presented) A method for selecting a candidate information unit for linking to a given information unit comprising:

automatically determining a content data of the given information unit by searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data;
automatically determining a user computer system data by running a diagnostic program on the user computer system to determine at least one of a component coupled in said user computer system and a software program loaded on said user computer system;
determining a content data of the candidate information unit;

comparing two of a ranked index data of the given information unit, a user computer system data, and a user input data to the content data of the candidate information unit;

selecting the candidate information unit for linking to the given information unit as a function of said comparing two of a ranked index data of the given information unit, a user computer system data, and a user input data to the content data of the candidate information unit.

23. (Original) The method of claim 4 wherein:

the candidate information unit includes an advertisement to be displayed to a user.

24. (Original) The method of claim 4 wherein:

the look-up tree includes at least one folder and at least one sub-folder.

25. (Previously Presented) A computer system comprising:

a server;

a given information unit;

a candidate information unit coupled to said server and said given information unit,

said server adapted to

determine a content data of the candidate information unit,

automatically determine a content data of the given information unit by

searching the given information unit, indexing the given information unit to produce indexed data, and performing a relevancy ranking on the indexed data,

automatically compare the ranked index data of the given information unit to the content data of the candidate information unit to create a comparison result; and

link the candidate information unit to the given information unit as a function of the comparison result.

9. EVIDENCE APPENDIX

No further evidence has been submitted with this Appeal Brief.

10. RELATED PROCEEDINGS APPENDIX

Per Section 2 above, there are no related proceedings to the present Appeal.